

EXHIBIT A

Proposed Pre-Trial Schedule for MDL 1720

April 1, 2024	Exchange initial witness lists
April 1 – August 31, 2024	Trial depositions of undeposed witnesses
April 26, 2024	Exchange preliminary exhibit lists
June 28, 2024	Exchange preliminary objections to exhibits
August 1, 2024	Simultaneous exchange of supplemental expert reports
October 1, 2024	Exchange Final Exhibit Lists Exchange Deposition Designations Deadline to Conclude All Supplemental Fact Discovery and Disclosures
October 11, 2024	Exchange proposed voir dire, jury instructions, and verdict form Serve Motions in Limine
November 1, 2024	Counter Designations of Depositions Exchange Other Required Components of Joint Pretrial Order (counsel, witness list, proposed stipulations of fact, etc.)
November 25, 2024	Responses to Motions in Limine
November 1 – December 6, 2024	Negotiate objections to components of pretrial order Negotiate proposed voir dire, jury instructions, and verdict form
December 13, 2024	Submission of Joint Pretrial Order (incl. deposition designations, counter-designations and objections, and reply designations and objections to counter-designations; exhibit lists w/objections & stipulations; stipulated facts; and proposed voir dire, jury instructions, and verdict form) MIL fully submitted
January 15, 2025	Exchange 1006 exhibits and Submit Materials Required by Rule 4
February 3, 2025	Trial commences